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Before the,

FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Administration of the)

North American Numbering Plan)

CC Docket No. 92-237

Phase I

ORIGINAL
FILE

**COMMENTS OF THE AMERITECH OPERATING COMPANIES TO
NOTICE OF INQUIRY (NOI)**

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TABLE OF CONTENTS

	<u>PAGE</u>
I. Summary and Introduction	1
II. Comments.....	4
A. Bellcore is the most efficient and effective location for the NANPA. However, there are several deficiencies in the current process that need to be cured.	4
B. If the NANPA is transferred, the new administrator must have the same multinationally recognized authority and responsibility as the current administrator.	10
C. Decisions on PCS numbering are premature.	11
D. The Companies support number portability.	12
E. The Companies support the other findings of the Commission, except they believe the Commission should deal with cost recovery now.....	13
III. Conclusion.....	14

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**COMMENTS OF THE AMERITECH OPERATING COMPANIES TO
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I. Summary and Introduction

The Ameritech Operating Companies¹ file their Comments in Phase I of the NOI released by the Commission on October 9, 1992. Simultaneous with these comments, the Companies are filing under separate cover their Comments in Phase II of the NOI.

In Phase I of the NOI, the Commission asks the parties to address the following issues concerning the administration of numbering. First, who should act as the North American Numbering Plan Administrator ("NANPA") including "the costs and benefits of an internationally integrated numbering plan and integrated centralized administrator."² Second, how the Commission can provide the "most efficient oversight."³ Third, whether mediation and arbitration techniques should be used when the industry fails to reach consensus.⁴ Fourth, if an advisory body should oversee the administration and design of the NANP.⁵ Fifth, how the costs of

¹ The Ameritech Operating Companies are: Illinois Bell Telephone Company; Indiana Bell Telephone Company, Inc.; Michigan Bell Telephone Company; The Ohio Bell Telephone Company; and Wisconsin Bell, Inc. ("the Companies").

²NOI ¶s 22-28.

³NOI ¶s 29 and 32.

⁴NOI ¶ 31.

administering the North American Numbering Plan ("NANP") should be financed.⁶ Sixth, what actions should be taken on numbering to foster personal communications services ("PCS").⁷ Seventh, the costs and feasibility of number portability between providers.⁸

The Companies submit that the goal of administration of numbering should be the continuation of an integrated and cost-effective multinational plan that provides an adequate supply of numbers and codes on a non-discriminatory basis to all qualified carriers and customers. The plan also must accommodate evolving technology and respond to changing customer needs. The Companies' comments in this proceeding are designed to further these goals.

The Companies believe that Bellcore is the most efficient and effective location for the NANPA and has helped the NANP meet the above goals over the past eight years. In addition, retaining the current NANPA and industry forum process is the most effective method of achieving these goals in the future. The current NANPA has performed exceedingly well and the Companies see no reason for change. If none the less, the location of the administrator is changed, then the move should not be made until 1996, when significant modifications currently being implemented in NANP and the United States' dialing plan are completed. In addition, any new administrator must receive the required multinational recognition from all eighteen nations covered by the NANP.

⁵NOI ¶ 32.

⁶NOI ¶ 33.

⁷NOI ¶ 40.

⁸NOI ¶ 41.

Whether the NANPA remains in Bellcore or is transferred, several defects in the current administrative system should be corrected. These deficiencies foist the costs of administration on just a few parties, create uncertainty about the recovery of the costs of designing, implementing and operating the NANP, and make it difficult for the NANPA to enforce industry approved guidelines.

The Companies also will discuss how PCS numbering is being addressed in the appropriate industry forums, and will show that it is premature for the Commission to take any action until these forums complete their work. In addition, the Companies already offer number portability options under state tariffs and will continue to offer those options to both PCS providers and to customers who switch to services provided by competitive access providers ("CAPs").

Late in 1991 and earlier this year, the Companies filed their comments and reply comments with the Commission concerning the Petition for Inquiry filed by the National Association of Regulatory Commissioners ("NARUC").⁹ The Companies' NARUC Comments and Reply Comments spell out in detail answers to the questions raised by NARUC, including most of those raised by the Commission in the NOI. The Companies will not repeat the arguments they made in response to the NARUC Petition here, but rather attach those pleadings.¹⁰

⁹Petition for Notice of Inquiry Addressing the Administration of the North American Numbering Plan filed by NARUC on September 26, 1991 ("NARUC Petition").

¹⁰Comments of the Ameritech Operating Companies filed on December 20, 1991 ("the Companies' NARUC Comments") and Reply Comments of the Ameritech Operating Companies filed on January 17, 1992 ("the Companies' NARUC Reply Comments").

II. Comments

- A. Bellcore is the most efficient and effective location for the NANPA. However, there are several deficiencies in the current process that need to be cured.

The NANP is a critical mechanism for integrating networks and services of multiple providers, now and in the future. The Commission's focus in the NOI on who should administer the NANP should not be allowed to divert attention from the more critical technical, policy and administrative numbering issues now confronting the industry. These critical issues include the continuation of an adequate supply of numbers and codes in an era of ever accelerating demand; development and implementation of new numbering capabilities to meet rapidly changing technology and customer needs; number conservation in an increasingly complex environment; the continuation of nondiscriminatory number assignments among an ever proliferating list of applicants; and assurance of reasonable cost recovery. Once those issues are resolved, who actually administers the plan is not as critical.

As a result of the vital importance of these critical technical and policy numbering issues, the Companies' NARUC Comments and Reply Comments did not emphasize the identity of the administrator. For the same reason, the Companies again will focus their comments on changes in the numbering administrative process that will help assure an efficient, effective and nondiscriminatory numbering plan for the future, regardless of who administers the plan. However, the Companies' emphasis on the administrative process should not be interpreted as a lack of support for the current NANPA.

The Companies agree with the Commission and with a recent resolution adopted by NARUC¹¹ that the NANP "has been administered over a long period of time with considerable skill and foresight."¹² The Companies also concur with the Commission's assessment that the NANP is "the envy of the rest of the world."¹³ The Companies would only add that this does not mean that the industry can afford to rest on its laurels and need not address the critical issues discussed above.

The Companies believe that the NANP's position as the envy of the world is no accident. Rather, the lofty position of the NANP is due to the skill and dedication of the NANPA and the ability of the local exchange carriers ("LECs") and the rest of the telecommunications industry in all eighteen nations covered by the NANP to voluntarily work together through open industry forums to reach consensus agreements. This ability of the participants across all NANP countries to voluntarily cooperate is required for an integrated plan and is the source for the benefits of the NANP described by the Commission in the NOI.¹⁴ These benefits include "a uniform dialing scheme applicable to eighteen countries, more than nine thousand local exchange carriers, several hundred long distance carriers, and more than a hundred million end users."¹⁵ As such, the Companies urge that the current integrated multinational system and administrator be retained and that changes be built upon that foundation.

¹¹NARUC Resolution Concerning Administrator of the North American Numbering Plan, adopted November, 1992 which proposes a transfer of the administrator function "[a]lthough Bellcore has done an excellent job as administrator"

¹²NOI ¶ 23.

¹³Id.

¹⁴NOI 23.

¹⁵Id.

However, there are several issues concerning the current system that need to be addressed, regardless of who administers the plan. These issues include the following:

1. The Commission asks in the NOI about the possibility of an advisory council to advise the NANPA on the administration and design of the NANP.¹⁶ However, there is ambiguity concerning whether or not such an advisory council would deal solely with domestic numbering issues. If the industry is to consider an advisory council that has multinational responsibility, the Commission should clarify how the council will receive the required multinational recognition. If the advisory council is to be limited to domestic issues, then its role must be carefully confined to the implementation, interpretation and administration of the plans and guidelines in the United States.

Regardless of the scope of the advisory council, the Companies are concerned that any advisory council could become an unnecessary additional complication in the resolution of numbering issues. The Companies also feel there is a danger that if such an advisory council has a limited membership, the council could thwart open industry processes or exclude interested parties. Historically, the Companies have favored the use of multinational industry forums to resolve numbering issues. These forums have been open to all interested parties, have multinational recognition and develop consensus guidelines. As a result, if there is an advisory council it should be limited to assisting the NANPA in implementing, administering and interpreting the existing plans and guidelines, while the plans and guidelines themselves continue to be established through the multinational industry forum process.

¹⁶NOI ¶ 32.

To the extent the proposed advisory council can meet and further the above objectives, the Companies support it. To the extent that the advisory council would undermine these objectives or duplicate or hinder the open industry forum process, the Companies oppose it.

2. The NANPA needs the clear authority to enforce the NANP, the United States' dialing plan and its guidelines in the United States. Clear enforcement authority is particularly important for those portions of the plans and the guidelines that promote number conservation necessary to contain costs, promote efficiency and ensure an uninterrupted supply of numbers for all customers and providers.

An example of the enforcement problems that have been encountered by the NANPA was the effort to obtain the return of additional Carrier Access Codes ("CICs") that some interexchange carriers had acquired through mergers and acquisitions. It was felt that return of these CICs may have been necessary to prevent a possible hiatus in FG-D CICs prior to their expansion in 1995. Although return of the merger and acquisition CICs was required by the applicable guidelines in effect at that time, the NANPA met with very limited success in obtaining their voluntary return. Even though the guidelines have since been changed, the problem of the inability of the NANPA to enforce the guidelines remains. This issue of the return of CICs is discussed in more detail in the Companies' NARUC Comments.¹⁷

In order to supplement the NANPA's enforcement authority in the United States, the Commission should adopt rules and permit LECs to file tariff provisions that require compliance with the NANP, the United States' dialing plan and the guidelines, and recognition of the NANPA's authority to

¹⁷at pp. 9-10.

enforce the plans and guidelines. These requirements would be a condition of providing or receiving interstate services.

3. In the NOI, the Commission asks about the possible use of mediation or arbitration to resolve numbering issues.¹⁸ The Companies do not feel that mediation or arbitration generally are appropriate for numbering issues, particularly where the industry has been unable to reach a consensus. In such a case, public policy issues would likely be involved and any ruling would, by necessity, affect the eighteen nations covered by the NANP. Since the Companies believe that basic numbering policy should not be established by a mediator or arbitrator, they do not favor mediation or arbitration for numbering issues that involve policy decisions. Moreover, due to the fact that number assignments are often required for a carrier to provide service and because of the extraordinary costs required to develop and operate the NANP, the Companies generally are not willing to have these critical issues resolved through mediation and arbitration.

However, voluntary mediation and arbitration could be used as an alternative if all parties affected by the decision consent to the use of those procedures. These mechanisms may be particularly useful where a dispute arises over an interpretation or application of the plans or guidelines. Arbitration and mediation also may be useful in resolving disputed facts.

4. Today, it is unclear whether or not the NANPA's and the industry's potential liability is limited in cases where they have complied with the NANP, the United States' dialing plan and their duly adopted guidelines. For that reason, the Commission should adopt a rule and authorize LEC tariffs that impose, as a condition of providing or receiving interstate services, agreement that the NANPA's and all LEC's liabilities are

¹⁸NOI ¶ 31.

limited regarding numbering, as long as they have complied with the NANP, the United States' dialing plan and their guidelines.

5. The Companies agree with the Commission's concern that "[i]t is at least questionable whether we can continue to expect those costs [of administration] to be incurred by private firms without compensation."¹⁹ The Companies therefore propose that, as a condition of providing or receiving any interstate services, the Commission require that carriers, providers and customers that acquire numbers and codes from the NANPA agree to pay to NANPA, on a prorata basis, the costs of administering the NANP and the United States' dialing plan.²⁰ Included would be LECs, interexchange carriers, enhanced service procedures ("ESPs") and customers. It is patently unfair that the costs of the NANPA are only borne by Bellcore member companies today, when all other carriers and customers benefit from the NANPA's activities and receive numbers and codes from it.

6. Although the Commission has chosen not to deal with the issue of the recovery of number related costs by network providers in the NOI,²¹ the Companies believe that the Commission should, at the earliest opportunity, provide assurance to all LECs and other providers that they will be given a fair opportunity to recover the interstate costs of developing, implementing and operating changes in the NANP. It is unfair to expect LECs and other providers to incur the very substantial costs required to develop, implement and operate the NANP and the United States' dialing

¹⁹NOI ¶ 33.

²⁰Of course, any entity receiving services under tariff would not compensate NANPA directly for numbers or codes received by it from the provider of the tariffed service. Rather, the provider would compensate the NANPA and would in turn be compensated through rates for the services it provides to its customers.

²¹NOI ¶ 47.

plan in their networks, when there is doubt about their ability to recover those costs from their customers. As a consequence, the Commission should find that number related costs arising from the development, implementation and operation of changes in numbering plans are "exogenous" for price cap carriers, if they relate to numbers and codes that support existing services. If these numbering costs relate to new services or capabilities, then the Commission should clarify that these costs can be recovered through rates for the new services involved.

- B. If the NANPA is transferred, the new administrator must have the same multinationally recognized authority and responsibility as the current administrator.

Consistent with the principle that the industry should build on the strengths of the current integrated multinational numbering system and administrator, the Companies believe the NANPA function should stay in Bellcore. In a nutshell, the current arrangement is working and there is no need to "tinker" with success. In any event, in order to avoid uncertainty and confusion during this critical period, the NANPA should stay in Bellcore at least until completion of the implementation of expansion of CICs and NPAs at the end of 1995. The industry should not endanger these important initiatives by changing administrators in the middle of their implementation.

If the administrator function is transferred, the new administrator must be empowered with the same multinational capabilities and have the same responsibilities as the current NANPA. This step is essential to maintaining an integrated multinational plan. Due to history and precedence, Bellcore and the existing industry forums have the required multinational acceptance, while a new administrator would not. As a result, any new administrator would require the following:

1. Formal recognition from all eighteen nations covered by the NANP.
2. Guidelines recognized in the NAPA nations. The current guidelines and existing open industry forums could be used to fulfill this requirement.
3. Enforcement powers recognized in all 18 nations covered by the NANP.
4. Power to recover the administrator's costs from all providers and customers that have numbers and codes assigned by the administrator.

In addition, the changes suggested in section II A above should be implemented, regardless of where the NANPA is located.

C. Decisions on PCS numbering are premature.

The Commission asks what, if any, action should be taken on numbering to foster the development of PCS.²² The Companies believe that it is too early to take any such action. Rather, consideration of PCS numbering should be deferred until PCS itself becomes more defined and the potential PCS numbering scheme is developed through the appropriate industry forums.²³

PCS numbering standards are being developed by international and national standards bodies. It is anticipated that the International Telegraph and Telephone Consultative Committee ("CCITT") will complete its work and release an international PCS numbering recommendation in March, 1993. In addition, implementation of PCS numbering in North America is

²²NOI ¶ 40.

²³This issue and the industry forums addressing PCS are dealt with in more detail in the Companies' NARUC Reply Comments at pp. 10-11.

being considered within the TI Committee of the Exchange Carriers Standards Association. Finally, the Industry Carrier Compatibility Forum ("ICCF") is conducting workshops to develop guidelines for the assignment of numbers for PCS services.²⁴

Some parties have asked the NANPA that "N00" service access code(s) ("SAC(s)") be assigned to what they generically call "PCS". The Companies believe that the assignment of SAC(s) for PCS should be made, if at all, only after the industry forums described above have completed their work. Only after these forums define PCS and its numbering scheme, will the industry be in a position to determine if SAC(s) are the proper numbering mechanism, the quantities needed, and the appropriate use of the SAC(s).

The Companies also do not believe that any of the remaining SAC(s) should be assigned for any purpose while the industry faces the possibility of NPA exhaust in some areas prior to implementation of the Interexchange Number Plan Area Code Plan ("INPA") in 1995. Prior to that date, these SAC(s) may well be needed for use as NPAs. As a result, the NANPA should not assign SAC(s) unless it has determined that the code(s) will not be needed as NPAs.

D. The Companies support number portability.

The Companies are staunch supporters of number portability between providers. They have consistently supported the concept in the 800 Database proceeding.²⁵ They likewise support number portability for other national

²⁴One of the ICCF's proposals is that any assignment of a service access code (SAC) to PCS providers be portable among service providers, similar to 800 database numbers. The Companies believe that if this type of provider-portability cannot be achieved at the inception of PCS, any interim use of a SAC should only be transitional and should terminate at a certain date. This up-front agreement will facilitate transition to a number-portability environment at a later date.

²⁵See for example, Comments of the Ameritech Operating Companies. In the Matter of Provision of Access for 800 Service, CC Docket No. 86-10, filed April 4, 1988 at pp. 8-10.

services, such as 900 and for PCS, when technically feasible and where warranted by demand.

Local number portability currently is provided by the Companies for PBX and Centrex services. PBX and Centrex portability is offered under state tariffs using DID trunks and call forwarding service. The costs of these portability arrangements are not extraordinary and the existing tariff rates are reasonable. When CAPs offer switched services, the Companies will offer the existing tariffed number portability options to customers that change from the Companies' PBX trunks and Centrex lines to a CAP's lines consistent with the NANP geographic structure.

The Companies also are committed to developing additional number portability options using new technologies, such as Advanced Intelligent Network ("AIN"). These capabilities will be introduced as they become technically feasible and where supported by sufficient demand to cover the costs of developing and operating the service. Since these new forms of portability will likely relate to intrastate exchange services, the Companies plan to introduce those options through intrastate services.

- E. The Companies support the other findings of the Commission, except they believe the Commission should deal with cost recovery now.

The Companies' NARUC Comments and Reply Comments provide compelling evidence supporting the Commission's conclusions that an inquiry is not warranted into the implementation of INPA²⁶, the Long Term

²⁶NOI ¶ 43, which is addressed in the Companies' NARUC comments at pp. 5-7 and Reply Comments at pp. 3-5.

Numbering Plan²⁷, Central Office code assignment guidelines²⁸, four digit CIC codes for Feature Group B access service²⁹, SACs³⁰ and reporting requirements.³¹ However, the Companies' NARUC Comments provide a strong case that the Commission should reconsider its decision not to clarify the handling of numbering plan costs under price caps at this time.³² The Companies will not repeat their argument here, but rather refer the Commission to their NARUC Comments and Reply Comments. Suffice it to say, these costs are not reflected in the current price cap indexes, and LEC's have no assurance they will be able to reflect these substantial costs in their rates in the future. The costs are being incurred now and the Commission should provide assurance now that all LECs and other providers will be able to recover their numbering costs in their rates.

III. Conclusion

The existing NANP processes can be improved by: (1) supporting the administrator's ability to enforce the NANP, the United States' dialing plan and their guidelines in the United States through rules and tariff provisions; (2) permitting voluntary arbitration and mediation: (3) limiting the

²⁷NOI ¶ 44, which is addressed in the Companies' NARUC Reply Comments at pp. 11-12.

²⁸NOI ¶ 45, which is addressed in the Companies' NARUC Comments at p. 14 and Reply Comments at pp. 8-9.

²⁹NOI ¶ 46, which is addressed in the Companies' NARUC Comments at pp. 7-10 and Reply Comments at pp. 3-5.

³⁰NOI ¶ 48, SAC assignment guidelines are developed through the industry forum process discussed in the Companies' NARUC Comments at pp. 19-20 and will be subject to the Long Term Numbering Plan discussed in the Companies' NARUC Reply Comments at pp. 11-12.

³¹NOI ¶ 49, which is discussed in the Companies' NARUC Comments at pp. 17-18 and Reply Comments at p. 9.

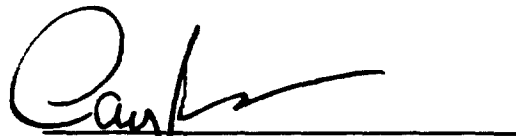
³²NOI ¶ 47, which is addressed in the Companies' NARUC Comments at pp. 11-13.

administrator's and network providers' liabilities for numbering in the United States through rules and tariff provisions; (4) requiring carriers and others in the United States to compensate the NANPA for its costs, and (5) authorizing LECs and other providers to recover their costs of developing, implementing and operating the NANP and the United States' dialing plan in their networks.

If, in spite of the fact that Bellcore is the most effective and efficient location for the NANPA, the function is transferred, then that transfer should not occur until 1996. Moreover, the new administrator must be empowered with the same multinationally recognized powers and perform the role as the existing NANPA.

PCS should be developed more fully and the PCS numbering defined by the on going industry forums before any further action is taken on numbering for PCS. Regarding local number portability, the Companies currently offer number portability under state tariffs and will extend those services to CAP customers. The costs and rates for this form of number portability are not extraordinary.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'F. Keene', written over a horizontal line.

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TABLE OF CONTENTS

	<u>Page</u>
I. Introduction and Summary	1
II. The NARUC Numbering Petition.....	4
III. INPA.....	5
IV. CIC.....	7
V. Recovery of CIC and INPA Costs.....	11
VI. Number and Code Assignment Guidelines	14
VII. Conservation and Reclamation.....	14
VIII. Reports	17
IX. The NANPA.....	18
X. The Industry Forum Process	19
XI. Conclusion	20

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**Comments of the
The Ameritech Operating Companies**

The Ameritech Operating Companies¹ file their comments in opposition to a request for an Inquiry concerning the administration of the North American Numbering Plan ("NANP") filed by the National Association of Regulatory Utility Commissioners ("NARUC"). The Companies believe that a general Inquiry into the NANP is unwarranted and would be counter productive.

First, NARUC fails to present any evidence that there is a need for a general Inquiry. The numbering changes that give rise to NARUC's Petition arise from long established industry plans which resolve the concerns raised by NARUC. The plans are simply the next phase in the evolution of the existing numbering plan. They enjoy broad industry support and are now several years into the development and implementation stage. These plans are, on balance, the most efficient and cost effective solutions available to ensure a continuous supply of telephone numbers and codes. They assure an adequate supply of numbers to meet the reasonable needs of end users for the

¹ The Ameritech Operating Companies are: Illinois Bell Telephone Co., Indiana Bell Telephone Co., Inc., Michigan Bell Telephone Co., The Ohio Bell Telephone Co., and Wisconsin Bell, Inc. (sometimes referred to as the "Companies").

foreseeable future, while not creating unwarranted costs or customer dislocations.

Second, the uncertainty caused by a general Inquiry could delay implementation of these plans so the supply of numbers and codes will not be replenished in time to prevent a shortage. At this time, the solution to numbering needs involves the enormous network and deployment planning necessary to implement the long standing four-digit Carrier Identification Code ("CIC") and Interchangeable Numbering Plan Area ("INPA") expansion plans in time to prevent an interruption in the supply of new codes and numbers. This is a massive and complex undertaking that must be completed in an extremely short period of time.

The Companies are committed to making every effort to have their network ready to support the new INPA and CICs in time to prevent a shortage of numbers and codes. They believe that this objective is obtainable, but their plans depend on strict adherence to assignment, conservation and reclamation guidelines. They also require no abnormal increase in demand which would cause the existing supply to exhaust earlier than expected. In addition, there can be no unforeseen delay or complication in the development of the software and equipment necessary to activate the plans in the network.

The Companies ask that the Commission not commence an Inquiry at this time because, ironically, it may introduce the very uncertainties and delays that may cause number or code exhausts. Rather, the Companies ask that the Commission continue to support the industry's efforts, including the conservation and reclamation. If necessary, the Companies will seek formal action from the Commission to enforce reclamation guidelines.

If an Inquiry were to be conducted, great care would be required to ensure it did not consider or make any change to the existing plans that would require revisions to the switch modifications and software upgrades currently under development by over 20 manufacture's and vendors.

Third, the four digit CIC and INPA plans are long established plans which enjoy broad industry support. The Commission staff has been advised and consulted on the numbering matters raised by NARUC. The Companies also have advised and consulted with their state regulators on these matters. In some cases, the Commission's staff and state regulators have participated in industry forums where these decisions were debated. There is no need to re-review these decisions at this late date.

Fourth, numbering issues have historically been and are best resolved by the North American Numbering Plan Administrator's ("NANPA") use of industry forums with regulatory oversight. These industry processes have worked well in the past and should continue to be used in the future to address new numbering issues as they arise.

Numbering is the quintessential area where the industry should be given the latitude to manage itself with regulatory oversight, as required. The issues are very technical and complex and decisions regarding them can result in very large expenditures. In addition, this area involves a numbering plan which arises from international treaties, affects foreign countries, and is administered by an entity who derives its authority from the Plan of Reorganization (POR) approved by MFJ Court at the time of divestiture.

There is no reason to consider changing either the CIC or INPA plans, the process or the plan administrator.

II The NARUC Numbering Petition.

On September 26, 1991, NARUC filed a Petition for Notice of Inquiry Addressing Administration of the North American Numbering Plan ("NARUC Petition"). NARUC asks the Commission to commence an Inquiry into several specific issues:

1. The costs of creating and deploying new INPA codes.
2. Alternate plans for addressing NPA exhaust.
3. The costs that may be allocated to specific telecommunications services that use numbering resources.
4. The effect that the new INPA and CIC plans will have on customer premises equipment and customer dialing plans.
5. Potential strategies for deployment of telephone numbers and codes for new services, such as Personal Communications Service ("PCS").
6. Possible competitive advantage to the Regional Bell Operating Companies ("RBOCs") of having Bellcore act as the North American Numbering Plan Administrator ("NANPA").
7. Equitable plans for assigning codes among local exchange carriers ("LECs"), interexchange carriers, enhanced service providers, cellular mobile carriers and PCS providers.
8. Methods that may reduce demand for scarce number and code resources or augment the existing supply.
9. Monitoring Reports necessary for regulators to exercise oversight, decide policy and inform the public.
10. Examination of any final proposal to assure that appropriate consideration has been given to independent telephone company equipment reconfiguration costs.

The Companies will address these items and will demonstrate that they have already been or are being reasonably resolved through the existing industry forums and regulatory oversight. The Companies also will demonstrate that the new INPA and four-digit CIC expansion plans are the optimal solutions available because they minimize the financial and customer impacts while assuring that an adequate supply is available.

III. INPA.

- A. The INPA expansion plan is the next step in the evolution of a long standing plan designed to efficiently expand the supply of NPAs and numbers, as the need arises, while retaining the existing ten-digit telephone number format. The current INPA expansion plan minimizes the costs of the expansion and the resulting changes to CPE and customer dialing patterns, while assuring an adequate supply of numbers.

In order to understand INPA, it is helpful to place the plan in its historical context. INPA is the next logical step in the evolution in a long term plan designed to expand the supply of NPAs and numbers when needed, without changing the existing number formats.

The NANP is based on an address format of ten digit numbers. The ten digit numbers are subdivided into two basic parts; 1) a 3-digit area or Numbering Plan Area (NPA) code, and 2) a 7-digit telephone number. The telephone number is made up a three-digit Central Office (CO) code, 4-digit station number.

To avoid a difficult and traumatic transition for both telephone companies and their customers, it was felt that a plan for continued growth was required which could accommodate demand for numbers within the limits of the existing ten-digit number format. As a result, a relief plan was adopted in 1962 which allowed for the use of codes previously reserved as NPA codes, as CO codes and visa versa. Symbolically, the ten-digit format would appear first as N0/1X-NXX-XXXX, when interchangeable CO codes is implemented within an NPA, and later NXX-NXX-XXXX when interchangeable NPA codes ("INPA") is implemented nationally.

The initial CO code format allow for a CO code universe within an NPA of 640 codes. The interchangeable CO code arrangement expanded the existing CO universe within an NPA from 640 to 792 assignable codes. The

national implementation of INPA would increase the current 152 assignable NPA codes to 792. This interchangeable codes arrangement necessitate special equipment arrangements and dialing procedures, but when successfully implemented, will increase the assignable telephone numbers from 973 million to some 6.3 billion, all within the confines of the 10-digit NANP number format.

In summary, INPA is the next step in the evolution of the long term overall plan initiated in 1947, to continuously evolve the NANP to meet the demand for additional numbers, while retaining the familiar ten-digit code and number structure.

NARUC now questions, at this late date, the validity of INPA as the best solution for resolving the pending number shortage. However, INPA is the only viable solution for NPA expansion, because it is the only solution that fully meets the criteria for a successful plan.

First, any plan must permit expansion of the existing supply of codes before they exhaust or minimize any shortage. Expansion must occur in an extremely short time frame since exhaust is now forecast for 1995. INPA is the only plan that could meet this criteria.

Second, any plan must provide an adequate supply of numbers to respond to future customer demand. There is no foreseeable end to the accelerating growth in the demand for numbers and any NPA expansion solution, therefore, must be far-sighted enough to supply a sufficient number of codes to accommodate that growth, now and into the future. INPA fully meets this criteria.

Third, INPA will minimize the cost and the adverse impact of the NPA expansion on customers. There is no question that more drastic plans, (one which would make basic changes in the format of numbers and codes